

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** AT&T Communications of New England, Inc., Set 3

**DATED:** October 12, 2001

**ITEM:** ATT-VZ 3-1 Mr. Mudge states at page 3, lines 3-5, of his rebuttal testimony: "The information used to compile the central office profiles is from Verizon MA's internal sources, the E-911 database, Competitive Local Exchange Carrier ("CLEC") tariffs, and their individual web sites." For each wire center listed in the central office profiles, please provide the source of the information, an explanation, and all documentation supporting Verizon's classification and listing each carrier as: (a) "resellers," (b) "UNE-P," (c) "Facility Based UNE-P," (d) "Facility Based CLEC Switch," and (e) "Collocators."

**REPLY:** Please see the Company's reply to ATT-VZ 2-1. For each specific central office a CLEC was classified as a:

- a. Reseller – when the profile data (resold lines by central office) indicated that the CLEC was utilizing resold services in the central office.
- b. Facility Based UNE-P Provider - when the profile data (UNE-P lines by central office) indicated that the CLEC was utilizing UNE-P facilities in the central office.
- c. Facility Based CLEC Switched Provider – when the profile data (E911 listings by NPA-NXX) indicated that the CLEC was listing telephone numbers in the central office area.
- d. Collocator - when the profile data (list of collocators) indicated that the CLEC had a collocation arrangement within the central office.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-1 Please provide the following information for each month beginning in January 2000 and extending to the most recent month for which data is available. "Flexpath T-1" refers to Verizon's retail digital PBX service.

- a. The total number of Flexpath T-1 exchange access lines/trunks being provided by Verizon at retail to business customers in Massachusetts.
- b. The total number of Flexpath T-1 exchange access lines/trunks installed as new inward orders by Verizon at retail to business customers in Massachusetts.
- c. The interval being quoted by Verizon to its retail customers for installation of Flexpath T-1 exchange access lines/trunks from the date at which the retail customer order is placed with Verizon until the date at which the Flexpath T-1 Service is installed.
- d. The actual installation interval experienced by Verizon with respect to its retail customer orders for installation of Flexpath T-1 exchange access lines/trunks from the date at which the retail customer order is placed with Verizon until the date at which the Flexpath T-1 Service is installed.
- e. The number of "missed installation dates" for Flexpath T-1 Service provided at retail by Verizon to its retail end-user customers.
- f. The total number of T-1 UNE loop facilities being provided by Verizon to CLECs in Massachusetts.

**ITEM:** NP-VZ 1-1  
(cont'd)

- g. The total number of T-1 UNE loop facilities installed by Verizon as new inward orders received from CLECs in Massachusetts.
- h. The interval being quoted by Verizon to CLECs for installation of T-1 UNE facilities from the date at which the CLEC order is placed with Verizon until the date at which the T-1 UNE loop facility is installed at the CLEC's customer's location.
- i. The actual installation interval experienced by Verizon to CLECs for installation of T-1 UNE loop facilities from the date at which the CLEC order is placed with Verizon until the date at which the T-1 UNE facility is installed at the CLEC's customer's location.
- j. The number of "missed installation dates" for T-1 UNE loop facilities provided by Verizon to CLECs in Massachusetts.
- k. The total number of T-1 Special Access facilities being provided by Verizon to CLECs in Massachusetts. Please provide a breakdown of intrastate and interstate T-1 Special Access facilities.
- l. The total number of T-1 Special Access facilities (broken down to indicate intrastate and interstate) installed by Verizon as new inward orders received from CLECs in Massachusetts.
- m. The interval being quoted by Verizon to CLECs for installation of intrastate and interstate T-1 Special Access facilities from the date at which the CLEC order is placed with Verizon until the date at which the T-1 Special Access facility is installed at the CLEC's customer's location.
- n. The actual installation interval experienced by Verizon to CLECs for installation of intrastate and interstate T-1 Special Access facilities from the date at which the CLEC order is placed with Verizon until the date at which the T-1 Special Access facility is installed at the CLEC's customer's location.
- o. The number of "missed installation dates" for intrastate and interstate T-1 Special Access facilities provided by Verizon to CLECs in Massachusetts.

**REPLY:** NP-VZ 1-1  
(cont'd)

- a-d. Please see the Company's reply to AG-VZ 1-11.
- e. Please see the Company's reply to AG-VZ 1-11 and AG-VZ 3-21, Attachment 2.
- f.-i. Please see the Company's reply to AG-VZ 1-11.
- j. Please see the Company's reply to AG-VZ 1-11 and AG-VZ 3-21, Attachment 2.
- k.-n. Please see the Company's reply to AG-VZ 1-11. Verizon objects to providing the requested information for interstate Special Access services on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.
- o. Please see the Company's reply to AG-VZ 1-11 and AG-VZ 3-21 Attachment 2. Verizon objects to providing the requested information for interstate Special Access services on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-2 Are UNE T-1 loops functionally equivalent to intrastate and interstate Special Access T-1 and Flexpath T-1? If the answer is no, please explain in detail all the functional differences between these three services and why they are functionally different.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

The local loop facilities used to support UNE T1 services are functionally equivalent to the local loop facilities used to support Special Access T1 and Flexpath T1 services. From Verizon MA's perspective, the three services, however, are not functional equivalents of each other. UNE T1 and Special Access T1 services are non-switched services; they are essentially dedicated pipes that run through Verizon MA's local network. CLECs and Carriers are free to configure these T1s and deliver specific services however they wish. Flexpath service, on the other hand, is a switched based, dial-tone service that provides the customer with dedicated trunk connections to a local Verizon MA central office switch.

VZ # 139

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-3 Please respond to the following questions that are in reference to the attached letter appearing on the Verizon.com website: "DS1 and DS3 Unbundled Network Elements Policy", September 24, 2001, available at [http://www22.verizon.com/wholesale/frames/generic\\_frame\\_east/0,2656,industry\\_letters,00.html](http://www22.verizon.com/wholesale/frames/generic_frame_east/0,2656,industry_letters,00.html).

- a. Please provide a paper copy of the letter.
- b. The letter states (para. 2) that "Conversely, Verizon is not obligated to construct new Unbundled Network Elements where such network facilities have not already been deployed for Verizon's use in providing service to its wholesale and retail customers." Please provide a legal citation to every statute or ruling which Verizon believes supports that statement.
- c. The letter states that "Verizon has no legal obligation to add DS1/DS3 electronics to available wire or fiber facilities to fill a CLEC order for an unbundled DS1/DS3 network element..." Please provide a citation to every statute or ruling which Verizon believes supports that statement.
- d. Does Verizon believe that the statements referenced in parts a. and b. above apply to its operations in Massachusetts? If the answer is anything but an unqualified yes, explain in detail how its legal obligations in Massachusetts differ from those holding in other states, relative to each of these statements.
- e. Has Verizon or Verizon ever issued a statement concerning its policies concerning the construction of new DS1 and/or DS3 facilities relative to its provision of retail services, including but not necessarily limited to Flexpath T-1 exchange access

**ITEM:** NP-VZ 1-3  
(cont'd)

lines/trunks? If the answer is yes, please provide a copy of that statement. If the answer is no, please describe in detail the policy that Verizon applies to orders for retail Flexpath T-1 exchange access lines/trunks when facilities are not initially available to fulfill the order.

**REPLY:**

Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. In addition, Verizon MA objects to the request to the extent it seeks a legal opinion as to the interpretation of state and federal statutes and rules.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-4 Please provide the following information for each month beginning in January 2000 and extending to the most recent month for which data is available. In your response, please provide a breakdown by wire center, if available.

- a. The percentage and total number of orders for Flexpath T-1 exchange access lines/trunks that were rejected due to a determination by Verizon that facilities were not available.
- b. The percentage and total number of orders for T-1 Special Access lines that were rejected due to a determination by Verizon that facilities were not available.
- c. The percentage and total number of orders for T-1 UNE loops that were rejected due to a determination by Verizon that facilities were not available.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.



**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-5 Please explain Verizon's practices relative to rearrangement and reuse of facilities when facilities are initially unavailable to fulfill an order for a service requiring a T-1 facility, including Flexpath T-1, Special Access T-1, and UNE loop T-1. In your response, please address the following circumstances.

- a. The T-1 common equipment has no spare ports/slots, but one or more of the ports/slots is assigned to a circuit that is no longer in use because service has been discontinued. Under the Company's applicable policies and procedures, could the technician reuse such a port/slot in order to fulfill the new order? Describe any differences that might occur between orders for Flexpath T-1, Special Access T-1, and UNE T-1.
- b. There is no unassigned T-1 copper or fiber distribution facility available to fulfill the order, but one or more T-1 distribution facility along the route passing the customer location is assigned to a circuit that formerly served a customer at a nearby location, but is no longer in use because service has been discontinued. Under the Company's applicable policies and procedures, could the technician reuse such a distribution facility in order to fulfill the new order? Describe any differences that might occur between orders for Flexpath T-1, IntraLATA Special Access T-1, and UNE T-1 loops.

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence in Phase I of this proceeding. Subject to and without waiver of its objection, the Company replies as follows:

- a. If a circuit is no longer in use because it has been disconnected (as described in the hypothetical), that facility would be available for assignment.

**REPLY:** NP-VZ 1-5  
(cont'd)

- b. It is not Verizon's practice to rearrange facilities when facilities are unavailable to complete an order. Rearrangement or redistribution of outside plant facilities from one location to another is cost prohibitive on an order-by-order basis (i.e., not practical to do because it requires substantial planning, engineering, and maintenance activity).

The practices described above apply equally to all services including retail, UNE, and access orders.

VZ # 142

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-6 Please identify and provide copies of all documents that provide guidelines to Verizon outside plant technicians concerning the Company's policies and procedures for rearrangement and/or reuse of facilities to provide any of the three categories of T-1 service listed in the previous question.

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence in Phase I of this proceeding. Subject to and without waiver of its objection, the Company replies as follows:

Please see the Company's reply to NP-VZ 1-5. It is not Verizon's practice to rearrange or reuse working facilities. Verizon does not have documents responsive to this request

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-7 Please indicate how many CLEC requests for DS-1 and DS-3 loops were received from Verizon during the period of January 2000 through September 30, 2001. Please list requests by month.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

VZ # 144

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-8 Please indicate how many CLEC requests for DS-1 and DS-3 loops were rejected in Massachusetts during the period January 2000 through September 30, 2001 for reasons of no facilities available. Please list rejections by month.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

VZ # 145

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-9 Please indicate how many CLEC requests for DS-1 and DS-3 loops that Verizon received during the period of January 2000 through September 30, 2001 and how many of those requests were actually provisioned. Please list response by month.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-10 Please indicate how many CLEC requests for DS-1 and DS-3 loops that Verizon received during the period of January 2000 through September 30, 2001 where DS-1 and DS-3 facilities were available but the CLEC did not order the facilities or withdrew its request. Please list response by month.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-11 For all CLEC orders for DS-1 and DS-3 loops submitted to VZ-MA between January 2000 and September 30, 2001, please provide the following information:

- a. Date of CLEC LSR\ASR;
- b. Type of facility ordered (e.g. DS1, DS3);
- c. Date of Verizon Firm Order Commitment (FOC);
- d. Verizon due date;
- e. Point A - name of exchange;
- f. Point Z - name of exchange; and
- g. Completion date.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.



**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-12 With reference to NP-VZ-1-11, above, if VZ-MA provisions the DS-1 or DS-3 loop beyond the date that Verizon stated that it would provision it, please provide the following:

- a. Reason(s) for missed completion date;
- b. If Verizon response is “no facilities,” please state the fill factor of the facilities currently in use between the points of termination requested;
- c. State whether or not “Verizon retail” maintains reserve facilities in the LFACs database or is providing services utilizing similar facilities between points of termination in question;
- d. Type of facility Verizon uses between Points of termination;
- e. Date CLEC notified of delay; and Anticipated new due date.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-13 If Verizon's response to a CLEC's inquiry for DS-1 or DS-3 loops is that the loops are "not available" or "no facilities" exist, precisely explain what Verizon means by each of these responses. Moreover, if fiber or copper facilities were available except that they were not attached to the electronics needed to make the facilities available, would Verizon indicate this to the requesting CLEC and provide the cost of attaching such facilities to the necessary electronics?

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

Both responses mean the same thing. Verizon engineers perform a facility check on every order. If copper or fiber loop facilities are available, the UNE DS1 or DS3 order will be assigned that facility.

If Verizon MA responds to the CLEC with "no facilities available," then Verizon MA does not have DS-1 or DS-3 loop facilities in place or far enough under construction to provide the CLEC with an estimated due date at the time of the request. Verizon MA would not automatically provide the CLEC a cost estimate to build facilities in connection with issuing the reject notice.

VZ # 150

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-14 If Verizon's response to a CLECs request for DS-1 or DS-3 loops is that the loops are not available, will Verizon provide information to the requesting CLEC that indicates that loops may be available through an alternative route? Similarly, will Verizon provide documentation to demonstrate that the loops are not available?

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

CLEC requests for DS-1 and DS-3 loops indicate the two points in the network where the circuit terminates (the "A" and "Z" ends), usually the local central office and an end user's location. The engineering review of the request necessarily incorporates a review of all paths between the two ends of the circuit. A response that indicates that facilities are not available means there is not an alternative route. Verizon MA does not provide documentation to demonstrate that the loops are not available.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-15      What is Verizon's procedure for notifying a CLEC that there are no facilities?

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

For UNE DS-1 and DS-3 loops, Verizon MA notifies CLECs regarding the availability of facilities when responding to the Access Service Request through the Firm Order Confirmation ("FOC").

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-16 In which Central Offices has Verizon experienced facilities issues in the last 12 months and were the CLECs given any upfront notification of this problem?

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

VZ # 153

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-17 Please explain Verizon's policies of reserving DS-1 and DS-3 loops. Please provide all procedures and policies that support this explanation.

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

Verizon MA assigns facilities on a first come, first serve basis. It does not maintain a reserve of "assignable" facilities.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-18 Please explain the basis by which Verizon determines the quantity of DS-1 and DS-3 loops that will not be made available to CLECs as unbundled services.

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

Verizon MA does not determine a quantity of loops that will or will not be made available to CLECs. Verizon MA plans and constructs facilities based on forecasted demand from Verizon retail, Verizon affiliates, and CLECs. There are instances where actual demand at a point in time outstrips available facilities. Verizon MA assigns facilities to orders automatically based upon the type of service and when they are received, regardless of the ordering party.

VZ # 155

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-19 Please explain the basis by which Verizon determines the quantity of DS-1 and DS-3 loops that will be made available to CLECs as unbundled services.

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

Please see the Company's reply to NP-VZ 1-18.



**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-20 For all CLEC orders for interoffice facilities ("IOF") such as DS-1, DS-3, STS-1 and optical carrier levels OC-3 and OC-12 submitted to VZ-MA between January 2000 and September 31, 2001, please provide the following information:

- a. Date of CLEC LSR/ASR;
- b. Type of facility ordered (e.g. DS-1, DS-3, OC-n);
- c. Date of Verizon Firm Order Commitment (FOC);
- d. VZ-RI due date;
- e. Point A - name of exchange;
- f. Point Z - name of exchange; and
- g. Completion date.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-21 With reference to NP-VZ-1-20, above, if Verizon provisions IOF beyond the date that Verizon stated that it would provision it, please provide the following:

- a. Reason(s) for missed completion date;
- b. If Verizon response is “no facilities”, please state the fill factor of the facilities currently in use between the points of termination requested;
- c. State whether or not “Verizon retail” maintains reserve facilities in the LFACs database or is providing services utilizing similar facilities between points of termination in question;
- d. Type of facility Verizon uses between points of termination;
- e. Date CLEC notified of delay; and Anticipated new due date.

**REPLY:** Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-22      If Verizon's response to a CLECs inquiry for dedicated IOF is that the IOFs are "not available" or "no facilities" exist, precisely explain what Verizon means by each of these responses. Moreover, if fiber or copper facilities were available except that they were not attached to the electronics needed to make the facilities available or existing, would Verizon indicate this to the requesting CLEC and provide the cost of attaching such facilities to the necessary electronics?

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

Both responses mean the same thing. Verizon MA engineers perform a facility check on every order. If a CLEC submits an Access Service Request ("ASR") for unbundled IOF, and Verizon MA responds to the CLEC with "no facilities available," then Verizon MA does not have interoffice facility transport infrastructure in place or far enough under construction to provide the CLEC with an estimated due date at the time of the request and therefore provision the UNE IOF order. Verizon MA would not automatically provide the CLEC a cost estimate to build facilities in connection with issuing the reject notice.

VZ # 159

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-23 If Verizon's response to a CLECs inquiry for dedicated IOF inquiry is that the IOFs are not available, will Verizon provide information to the requesting CLEC that indicates that IOFs may be available through an alternative route? Similarly, will Verizon provide documentation to demonstrate that the IOFs are not available?

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

Please see the Company's reply NP-VZ 1-22.

When provisioning dedicated unbundled interoffice facilities (e.g. DS-1s, DS-3s, OC-3s, OC-12s) Verizon MA looks for available facilities including alternate routes. The CLEC, however, does have the option of subscribing to alternative competitive transport providers. No documentation is provided to the CLEC (other than an ASR query back to the CLEC) indicating that no facilities are available.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-24 Please explain Verizon's policies of reserving dedicated IOF facilities. Please provide all procedures and policies that support this explanation

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

Verizon MA assigns facilities on a first come, first serve basis. It does not maintain a reserve of "assignable" facilities.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-25 Please explain the basis by which Verizon determines the quantity of IOFs that will not be made available to CLECs as unbundled services.

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

Where facilities exist, Verizon-MA makes unbundled IOF dedicated transport available within the same LATA between CLEC central offices and Verizon MA central offices and among Verizon MA central offices pursuant to interconnection agreements and Verizon MA's wholesale tariff on a first-come first-served basis.

VZ # 162

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Network Plus, Inc., Set #1

**DATED:** October 11, 2001

**ITEM:** NP-VZ 1-26 Please explain the basis by which Verizon determines the quantity of IOFs that will be made available to CLECs as unbundled services.

**REPLY:** Verizon objects to this request on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objection, the Company replies as follows:

Please see the Company's reply to NP-VZ 1-25.